



Pengana Capital Limited
ABN: 30 103 800 568
AFSL No: 226566
Date Prepared: 18 December 2009

FINANCIAL SERVICES GUIDE

What is the purpose of this Financial Services Guide (“FSG”)?

This FSG is an important document that tells you about the services and products that Pengana Capital Limited (“Pengana”, “we”, “us”, or “our”) is authorised to provide to you under our Australian Financial Services Licence (AFSL).

This FSG contains important information about:

- who we are;
- the financial services we offer;
- the financial products to which those services relate;
- how we and others are paid in connection with those services;
- your privacy;
- how we deal with complaints;
- our compensation arrangements; and
- how we can be contacted.

This FSG should assist you in deciding whether to use any of the products and services we offer.

When someone gives you personal advice recommending one of our products or offers to sell or issue to you one of our products you may receive a Product Disclosure Statement (PDS) relating to that product before you acquire it. You should read the PDS carefully as it contains important information to assist you in making an informed decision about the product.

What Financial Services and products does Pengana offer?

Pengana is authorised under its AFSL to provide financial product advice and to deal in the following classes of financial products to retail and wholesale clients:

- deposit and payment products limited to basic deposit products;
- derivatives;

- foreign exchange contracts;
- debentures, stocks or bonds issued or proposed to be issued by a government;
- interests in managed investment schemes; and
- securities.

Pengana is also authorised by its AFSL to operate registered managed investment schemes and to operate and provide custodial services with respect to its unregistered managed investment schemes (collectively known as **Funds**).

Although we are authorised under our AFSL to do so, we do not generally provide personal financial product advice, i.e. advice that takes into account your personal financial situation, needs or objectives. If you would like personal advice, you should contact a licensed financial advisor. The advisor is obliged to provide you with a Statement of Advice in respect of any personal financial product advice given to you.

Who is Pengana?

Pengana acts on its own behalf as the holder of an AFSL when it gives financial product advice and issues interests in its Funds. Pengana acts as responsible entity of the Funds it operates and deals in financial products on behalf of these Funds.

Pengana is responsible for the services we provide, and we are not the representatives of any other AFSL holder.

Payments to Pengana and Others for the services provided

For its provision of investment management services, marketing and sales services, and where relevant, responsible entity and trustee services, Pengana will receive remuneration in the form of management costs received by Pengana Capital Limited.

Any financial product advice provided by Pengana is free of charge. Financial advisors may receive fees if they provide advice to you or arrange for you to acquire an investment in any of the Funds. Details of the fees your advisor receives should be disclosed in a Financial Services Guide and/or a Statement of Advice you should receive from the advisor.

Pengana's employees, directors, and other staff are paid a salary but do not receive any commissions. However they may be eligible for bonus payments from us based on their performance in meeting or exceeding individual, team, or company performance objectives.

Pengana may rebate some of its management costs or provide other benefits to third parties who refer customers to the Funds.

The Privacy of your personal information

At Pengana, the privacy of your personal information is important to us. Any personal information collected will be handled in accordance with our Privacy Policy and our obligations under relevant privacy laws (including the Privacy Act 1988 and the SPAM Act 2003).

Our Privacy Policy sets out details of how we comply with our legal obligations in the handling of your personal information. A copy of our Privacy Policy is available upon request, or via our website www.pengana.com.

Complaints Handling

We have established procedures to properly consider and address any complaint you may have. A copy of the “Summary of Complaints Handling Procedures – Information for Clients” is available on request. If you wish to make a complaint about any of our products or services, please contact our Complaints Officer using the following contact information:

Complaints Officer
Level 29, 20 Bond Street
Sydney NSW 2000

Telephone: +61 2 8524 9900
Fax: +61 2 8524 9911
Email: Katrina.Glending@pengana.com

If you are not satisfied with our response to your complaint, you may lodge a written complaint with the Financial Ombudsman Service for an independent review of your matter.

Financial Ombudsman Service
GPO Box 3
Melbourne VIC 3001

Telephone: 1300 780 808
Facsimile: (03) 9613 6399
Email: info@fos.org.au
Web site: www.fos.org.au

This external dispute resolution body is established to assist you in resolving your complaint where you have been unable to do so with us. However, it is important that you contact us in the first instance so we can address your concerns.

Compensation Arrangements

We hold professional indemnity insurance which, in our opinion, complies with the requirements of section 912B of the Corporations Act (Cth) 2001. The professional indemnity insurance that we have in place covers claims in relation to the conduct of staff and employees who no longer work for us (but who did at the time of the relevant conduct).

How you can contact Pengana

Mail: Level 29, 20 Bond Street
Sydney, NSW 2000

Telephone: (02) 8524 9900
Facsimile: (02) 8524 9901
Website: www.pengana.com